

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

In re: Lindell Management LLC Litigation

Case No. 23-cv-1433  
(JRT/DJF)

**DECLARATION OF  
CARY JOSHI**

I, Cary Joshi, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am an attorney with Bailey & Glasser LLP. I am over the age of 18 and make this declaration upon my personal knowledge.
2. On August 1, 2024, Mr. Zeidman received written responses to interrogatories.
3. However, as of the date of this filing, Mr. Zeidman has not received written responses to his requests for production of documents.
4. I contacted Tom Miller, counsel for Lindell Management LLC, and asked him about the responses to the requests for production of documents. (Exhibit A).
5. Mr. Miller responded that “We are targeting Friday for this....”
6. Mr. Miller did not give any reason or justification for failing to comply with the Court’s July 17, 2024 order.
7. I declare under penalty of perjury that pursuant to the laws of the United States of America that the foregoing is true and correct.

DATED: August 8, 2024

**BAILEY & GLASSER LLP**

/s/ Cary Joshi  
Cary Joshi  
*Attorney for Petitioner Robert Zeidman*